



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

NOV 13 1997

Ref: 8EPR-EP

Hugh C. Thompson
Forest Supervisor
Dixie National Forest
82 North 100 East
P.O. Box 627
Cedar City, Utah 84721-0627

Re: Spruce Ecosystem Recovery
Project, Draft Environmental
Impact Statement

Dear Mr. Thompson:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS). We submit the following concerns and comments for your consideration in preparation of the Final EIS.

We understand the proposed action is necessary, in part, because of epidemic spruce beetle infestation resulting in extensive spruce mortality. Approximately 7821 acres will be treated including 2872 acres of dead and infested Engelmann spruce within the Spruce Ecosystem Recovery Project (SERP) area will be harvested. In addition, approximately 1013 acres of aspen in six Focus Areas within the SERP will receive treatment to enhance regeneration to achieve desired structural and species diversity. Selective prescribed fire is proposed for 3895 acres. Five new miles of road to support the proposed action will be constructed.

The Forest is to be congratulated on the completeness of project need documentation in Chapter One and the mitigation discussion by resource in Chapter Two. The Epa concerns related to this type of project are generally related to water quality impacts. We note proposed mitigation on p. 2-4 and elsewhere in Chapter Four provide direction for setbacks to prevent surface waterbed and riparian vegetation degradation from harvest, ground disturbance or burning activities. Other potential sedimentation concerns from road construction and use of existing roads in the project area are adequately addressed.



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Discussion of direct, indirect and cumulative impacts to the various resources in Chapter Four results in a complete picture of how the proposed interrelated treatment activities can provide for recovery of the degraded forest condition.

We understand that additional spruce beetle infestation is expected to continue within the SERP project area for the next 10 to 15 years. Selected roads will be closed and reopened as necessary to meet future dead timber harvest needs. Upon project termination we recommend that elimination of road cuts be done to reduce sedimentation during spring runoff.

Based on the procedures the EPA uses to evaluate the adequacy of the information and potential environmental impacts of the proposed actions and alternatives in an EIS, the EPA Region VIII rates this DEIS as LO. This means that our review has not identified any potential unmitigated environmental impacts which require substantive changes to the proposal. A copy of our rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DEIS. Should you have any questions, please contact Mike Hammer or my staff at (303) 312-6563.

Sincerely,

Carol L. Campbell

Carol L. Campbell, Director
Ecosystems Protection Program

cc: Elaine Suriano, OFA EPA-HQ